

**To:** Montgomery, Michael[Montgomery.Michael@epa.gov]; Albright, David[Albright.David@epa.gov]  
**Cc:** Rao, Kate[Rao.kate@epa.gov]; Zito, Kelly[ZITO.KELLY@EPA.GOV]  
**From:** Mogharabi, Nahal  
**Sent:** Tue 3/10/2015 6:12:56 PM  
**Subject:** RE: Times available

Thanks, Mike.

Here is what I plan to say to her. Let me know if this works. I will re-send the letter to her once we are able to do so. Please let me know when we have the green light.

**Yes, EPA did reach an agreement with the State on a plan to return to compliance which included some additional specific deadlines noted in EPA's March 9th letter (attached). EPA did require no drilling of new wells in the 11 formations unless an exemption was given by EPA.**

Thanks,

Nahal

**From:** Montgomery, Michael  
**Sent:** Tuesday, March 10, 2015 10:54 AM  
**To:** Mogharabi, Nahal; Albright, David  
**Cc:** Rao, Kate; Zito, Kelly  
**Subject:** RE: Times available

Hey Nahal –

She has it right, we did **reach agreement with the State** on a plan to return to compliance. She is also correct that the plan is the plan they submitted plus additional specific deadlines and some targets to keep the process moving. Yes, the one thing we expressly rejected in their plan was the drilling of new wells in the 11 formations unless/until they are able to obtain an exemption from us.

mike

**From:** Mogharabi, Nahal  
**Sent:** Tuesday, March 10, 2015 10:42 AM  
**To:** Montgomery, Michael; Albright, David  
**Cc:** Rao, Kate; Zito, Kelly  
**Subject:** FW: Times available

Hi Mike,

Please see the below. Looks like folks are talking about the letter at the hearing today.

Please see the below. I'm not sure if that is accurate. We are not approving the plan until they agree with the new deadlines and requirements in our most recent letter. Is that correct? As to their second questions, I'm not sure that is accurate either, we are just setting a deadline for proposed exemption requests to be sent to us to us by.

Can you help clarify.

Thanks,

Nahal

**From:** Cart, Julie [<mailto:Julie.Cart@latimes.com>]  
**Sent:** Tuesday, March 10, 2015 10:27 AM  
**To:** Mogharabi, Nahal  
**Subject:** RE: Times available

nahal

i'm in Sacramento at a hearing regarding the state's UIC program.

There are references to a letter sent to DOGGR yesterday.

i've quickly reviewed it.

Correct to say that EPA approved the state's plan to get the UIC program in compliance with fed law. also, set new deadlines for review.

did the EPA mandate no new injection wells in the 11 aquifers in question, or did that promise come from the state?

thanks

julie cart